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March 19, 2020

By: ECF  
The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: O'Conner, et al.  
v.  
Agilant Solutions, Inc.  
S.D.N.Y. Docket No. 18-CV-6937 (GHW)

Dear Judge Woods,

Please accept the following joint letter submitted as per Your Honor's directive during the telephone conference in this matter that was held on March 16, 2020 at 4:00 pm. The parties have conferred and agreed upon the language to be included in the Corrective Notice. Please see draft attached as Exhibit "A" hereto. The parties jointly request that Your Honor approve the form and the procedure described below. (While Defendant has not objected to the language, such does not and should not, be considered as a waiver of any of Defendant's rights in this matter, including rights to object on appeal to the Corrective Notice and the underlying rulings thereto.)

In order to expedite receipt of the Corrective Notice, the parties have agreed as follows:

1. The Corrective Notice will be sent to all FLSA Collective Members, as defined by Your Honor's Memorandum and Order (Dkt. No. 70), who were asked to sign and/or who have signed the arbitration agreements with ASI.
2. Within 24 hours (Jewish Sabbath excluded) of Defendant's receipt of Court approval of the form of the Corrective Notice, Defendant will provide the internal company email addresses of all individuals identified in paragraph 1, to the vendor that has been retained by Plaintiffs to distribute the Corrective Notices.
3. The vendor will be instructed to expedite emailing of the Corrective Notices to individuals identified in paragraph 1.
4. Should there be any individual identified in paragraph 1 that is no longer employed by Defendant or otherwise does not have access to the internal company email address, the vendor will be instructed to expeditiously mail a hard copy of the Corrective Notice to the address previously provided.

Respectfully submitted,

s/ Ira A. Sturm

Ira A. Sturm

All Counsel (By: ECF)